

1 JOHN F. SCHNERINGER
Nevada Bar No. 14268
2 **GORDON REES SCULLY MANSUKHANI, LLP**
300 South 4th Street, Suite 1550
3 Las Vegas, Nevada 89101
4 Telephone: (702) 577-9300
Direct Line: (702) 577-9304
5 Facsimile: (702) 255-2858
E-Mail: jschneringer@grsm.com
6

7 *Attorneys for Portfolio Recovery Associates, LLC*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 WOLFGANG R. ALTENBURG, an individual;
11 Plaintiff,

12 vs.

13 AMERICAN EXPRESS NATIONAL BANK, a
14 national banking association; BARCLAYS BANK
DELAWARE, a foreign corporation; CACH, LLC, a
15 foreign limited-liability company; CAPITAL ONE
BANK USA, N.A., a national banking association;
16 CREDIT ONE FINANCIAL, a domestic
corporation; DISCOVER FINANCIAL SERVICES
17 LLC, a foreign limited-liability company; JP
MORGAN CHASE BANK, N.A., a national banking
18 association; PORTFOLIO RECOVERY
ASSOCIATES, LLC, a foreign limited-liability
19 company; EQUIFAX INFORMATION SERVICES,
LLC, a foreign limited-liability company;
20 EXPERIAN INFORMATION SOLUTIONS, INC., a
foreign limited-liability company;
21 Defendants.
22

Case No.: 2:21-cv-00949-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO COMPLAINT
(Second Request)**

23 Pursuant to Local Rule IA 6-1, Defendants Portfolio Recovery Associates, LLC (“PRA”),
24 by and through its attorneys, John F. Schneringer of Gordon Rees Scully Mansukhani, LLP, and
25 Plaintiff Wolfgang R. Altenburg (“Plaintiff”), by and through his attorney, Kevin Hernandez of
26 Law Office of Kevin L. Hernandez, hereby stipulate and agree as follows:

- 27 1. Plaintiff filed his Complaint on May 17, 2021.
28 2. PRA was served with the Summons and Complaint on May 25, 2021.

Gordon Rees Scully Mansukhani, LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

3. PRA's deadline to file a response to the Complaint was June 15, 2021.

4. On June 9, 2021, PRA filed its first stipulation for extension of time to file response to complaint. (Dkt No. 14). The court agreed to the stipulated extension that same day. (Dkt No. 15).

5. The current deadline for PRA to file its response to the Complaint is July 20, 2021.

6. PRA requests an additional fourteen-day extension to file its response to the Complaint up to and including August 3, 2021.

7. PRA continues to investigate the substance of Plaintiff's claims and the additional extension will allow PRA to fully respond to Plaintiff's Complaint.

8. Plaintiff does not oppose PRA's requested second extension.

9. Accordingly, PRA will file its responsive pleading to Plaintiff's Complaint on August 3, 2021.

10. This stipulation is not made for purposes of delay.

IT IS SO STIPULATED.

DATED this 19th day of July 2021.

**GORDON REES SCULLY
MANSUKHANI**

DATED this 19th day of July 2021.

**LAW OFFICE OF KEVIN L.
HERNANDEZ**

/s/ John F. Schneringer

John F. Schneringer
Nevada Bar No. 14268
300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101
*Attorneys for Defendant, Portfolio
Recovery Associates, LLC*

/s/ Kevin L. Hernandez

Kevin L. Hernandez, Esq.
Nevada Bar No. 12594
8872 S. Eastern Avenue, Suite 270
Las Vegas, Nevada 89123
*Attorney for Plaintiff, Wolfgang R.
Altenburg*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: July 19, 2021